## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA	)
Plaintiff,	)
vs.	) CRIMINAL NO. 21-CR-0303 MV
RYAN HARRIS,	) )
Defendant.	) )

## UNITED STATES' UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT'S SENTENCING MEMORANDUM AND OBJECTIONS (DOC. 65)

COMES NOW the United States of America, by and through Letitia Carroll Simms, Assistant United States Attorney for the District of New Mexico, and hereby requests an additional week to respond to the Defendant's Sentencing Memorandum with Objections to Presentence Investigation Report filed June 27, 2023, in Document 65.

The United States' response is due July 5, 2023, as the seven-day deadline fell on July 4, 2023. Due to the nature of the objections, as well as the volume of attachments, the United States will need additional time to complete a comprehensive response that will most effectively assist the Court.

Counsel for the Defendant does not oppose this request. The United States respectfully requests that the deadline to file its response be extended to July 11, 2023.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ

**United States Attorney** 

/s/ LC Simms 7/5/2023 LETITIA CARROLL SIMMS Assistant U.S. Attorney Post Office Box 607 Albuquerque, NM 87102 (505) 346-7274

I HEREBY CERTIFY that on the 5TH day of July, 2023, I filed the foregoing using CM/ECF which caused the parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic filing:

/s/ LC Simms
Letitia Carroll Simms
Assistant United States Attorney